

**Before the
Federal Communications Commission
Washington DC 20554**

In the Matter of)	
)	
Wireless Telecommunications Bureau Seeks)	
Comment on Wilson Electronics Petition)	WT Docket No. 10-4
for Rulemaking to Eliminate the Personal Use)	RM-11784
Restriction on Wideband Consumer Signal)	
Boosters)	
)	

REPLY COMMENTS OF THE UTILITIES TECHNOLOGY COUNCIL

The Utilities Technology Council (“UTC”) hereby files the following reply comments in response to the Commission’s *Public Notice* in the above-referenced proceeding.¹ UTC supports the Petition by Wilson Electronics (Wilson), and echoes the comments on the record that overwhelmingly support the Petition as well.² UTC agrees with Wilson and the comments that supported its Petition that the personal use restriction should be eliminated for all consumer signal boosters. As Wilson explained in its Petition, the Commission has initiated a further rulemaking to eliminate the personal use restriction on provider-specific signal boosters; and therefore the Commission should also eliminate the personal use restriction for wideband consumer signal boosters as well. UTC supports Wilson’s request to replace the personal use restriction “with a multiprovider registration requirement for [wideband consumer signal boosters]” so that businesses, public safety entities, public institutions, and other enterprises may purchase and use consumer signal boosters.³ Elimination of the personal use restriction on

¹ Wireless Telecommunications Bureau Seeks Comment On Wilson Electronics Petition for Rulemaking to Eliminate the Personal Use Restriction on Wideband Consumer Signal Boosters, WT Docket No. 10-4, *Public Notice*, DA 17-220 (March 3, 2017).

² Wilson Electronics, LLC, Petition for Further Rulemaking, WT Docket No. 10-4 (filed Dec. 21, 2016) (hereinafter “Petition”).

³ Petition at iv, 5, 11-16.

wideband signal boosters would promote the use of signal boosters by utilities and other enterprise consumers, who need to be able to boost signals from multiple providers so that different subscribers can make and receive calls in their offices and in the field where signals from wireless networks are otherwise weak.

I. Introduction

UTC is the association for the telecom and information technology interests of electric, gas and water utilities and other critical infrastructure industries (CII). Its members include large investor-owned utilities who serve millions of customers across multi-state service territories, as well as smaller rural electric cooperative utilities and municipal utilities who may only serve a few thousand customers in remote areas and isolated communities across the country. Large or small, utilities rely on communications to support the safe, reliable and secure delivery of essential electric, gas and water services to the public at large. Utilities have an interest in using signal boosters to improve the reception of communications, particularly in buildings and offices where the signal is weak and/or blocked by reflective materials used in the construction of the buildings. However, the personal use restriction will discourage utilities from using wideband consumer signal boosters, because they will not be able to boost the signal from multiple providers. As such, UTC has an interest in the instant Petition and is pleased to file its comments in support of eliminating the personal use restriction on wideband consumer signal boosters.

II. UTC Supports Wilson's Petition to Eliminate the Personal Use Restriction on Wideband Consumer Signal Boosters.

UTC agrees with Wilson and numerous comments on the record that the Commission should eliminate the personal use restriction on wideband consumer signal boosters.⁴ UTC

⁴ See e.g. Comments of Ad Hoc Telecommunications Users Committee in WT Docket No. 10-4 at 2 (filed March 23, 2017)(stating that “The personal use restriction contained in 47 C.F.R. § 20.21(a) imposes an ambiguous and unnecessary limitation on the deployment and use of consumer boosters.”)

supports eliminating the personal use restriction on wideband consumer signal boosters, because doing so would serve the public interest by promoting wireless broadband access and supporting reliable communications to support the safe and effective delivery of essential energy and water services. As Surecall explains, “[s]ignal boosters provide an important tool for businesses and consumers to ensure their access to wireless broadband services.” Moreover, the Commission itself has recognized that “individual consumers, public safety entities, building owners, and many others, currently need signal boosters to meet their communications needs, particularly in rural areas.”⁵

The personal use restriction provides that Consumer Signal Boosters may only be sold to members of the general public for their personal use. As such, it prevents businesses from using wideband consumer signal boosters. UTC agrees with the comments of Surecall that “[n]o technical or policy reason exists to limit user-ready signal boosters solely to individuals for personal use.”⁶ UTC also agrees with the comments of TIA that “[s]o long as harmful interference to licensees is not an issue – and there is no evidence suggesting otherwise – the Commission should not impose non-technical limitations on devices that restrict particular use cases.”⁷ Furthermore, the Network Protection Standard that was adopted by the Commission in 2013 has proven effective at preventing interference from wideband consumer signal boosters and provider-specific consumer signal boosters.⁸ Therefore, there is no reason to continue to

⁵ *Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission’s Rules to Improve Wireless Coverage Through the Use of Signal Boosters*, Report and Order, WT Docket No. 10-4, FCC 13-21 at ¶134 (February 20, 2013) (“Order”).

⁶ Comments of Surecall in WT Docket No. 10-4 at 6 (filed March 23, 2017).

⁷ Comments of The Telecommunications Industry Association in WT Docket No. 10-4 at 1 (filed March 23, 2017)(hereinafter “comments of TIA”).

⁸ See Comments of Sprint in WT Docket No. 10-4 at 2 (filed March 23, 2017)(stating “Sprint believes that the Network Protection Standards that consumer signal boosters must include, even when deployed by small groups and

restrict wideband or provider-specific consumer signal boosters to personal use.⁹

CONCLUSION

Given that eliminating the personal use restriction on wideband consumer signal boosters will promote the overarching goal of improving wireless broadband access for consumers and businesses – including utilities – UTC supports the Petition. Furthermore, UTC submits that the personal use restriction serves no useful purpose, given that the Network Protection Standard provides sufficient protection against interference. Therefore, the Commission should eliminate the personal use restriction on wideband consumer signal boosters.

Respectfully,

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small organizations, are sufficient to appropriately protect and coexist with carriers' networks.”)

⁹ See e.g. Comments of the Enterprise Wireless Alliance in WT Docket No. 10-4 at 2 (filed March 23, 2017)(stating that “[t]he Network Protection Standard (“NPS”) adopted in 2013 established a baseline for consumer booster design quality agreed to by equipment vendors and carriers,” and adding that “it appears that adherence to the NPS has proven highly effective in preventing interference before it occurs, thereby minimizing the often very time-consuming process of locating and correcting a problem device after the fact.”) See also Comments of Ad Hoc Telecommunications Users Committee in WT Docket No. 10-4 at 6 (emphasizing that “the personal use restriction is not necessary to prevent interference with wireless licensee networks.”)